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Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

WB MUSIC CORP., et al.)	Case No: 5:16-cv-00600-JGB(SPx)
)	
Plaintiffs,)	STIPULATION TO RELEASE AND PAY
)	FUNDS DEPOSITED WITH THE
v.)	COURT
)	
ROYCE INTERNATIONAL)	
BROADCASTING CORP., et al.,)	
)	
Defendants.)	
)	
)	
)	

WHEREAS, an Amended Judgment was entered against Defendants Royce International Broadcasting Corp., *et al.*, in this matter on August 6, 2018 (Dkt. 209);

WHEREAS, on October 29, 2020, the Court ordered Defendants to deposit with the Court by November 17, 2020 “the amount satisfying the Amended Judgment and interest accrued as of October 13, 2020” (Dkt. 327);

STIPULATION TO RELEASE AND
PAY FUNDS DEPOSITED WITH THE COURT

1 **WHEREAS**, on or around November 9, 2020, the Court received payment of
2 \$1,301,523.16 (the “Original Deposit”) from defendant Edward R. Stolz, II (Dkt.
3 333), representing an amount sufficient to satisfy the Amended Judgment and interest
4 accrued as of October 13, 2020;

5 **WHEREAS**, a Second Amended Judgment was entered against Defendants in
6 this matter on January 13, 2021 (Dkt. 350);

7 **WHEREAS**, on January 14, 2021, the Court ordered Defendants to deposit
8 with the Court “the amount satisfying the Second Amended Judgment” (Dkt. 352);

9 **WHEREAS**, on or around February 3, 2021, the Court received payment of
10 \$384,150.00 (together, with the Original Deposit, the “Deposited Funds”) from
11 defendant Stolz (Dkt. 367), representing an amount sufficient to satisfy the Second
12 Amended Judgment;

13 **NOW, THEREFORE**, Defendants and Plaintiffs, through their undersigned
14 counsel, respectfully request that the Court enter an order providing that the
15 Deposited Funds in the amount of \$1,685,673.16 shall be released by the Court and
16 paid by check, payable to “WB Music Corp., et al.” The check shall be mailed by the
17 Court to Plaintiffs’ Counsel at the following address by no later than June 15, 2021:

18 ASCAP
19 250 West 57th Street
20 New York, New York 10107
21 ATTN: Jackson Wagener

22 Dated: April 29, 2021

23 By: /s/ Sharon D. Mayo
 Sharon D. Mayo

24 By: /s/ Dariush G. Adli
 Dariush G. Adli

25 ARNOLD & PORTER KAYE
26 SCHOLER LLP

27 ADLI LAW GROUP, P.C.

28 Attorneys for Plaintiffs

Attorneys for Defendants

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4, I hereby attest that all other signatories listed, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

Dated: April 29, 2021

ARNOLD & PORTER KAYE SCHOLER LLP

/s/ Sharon D. Mayo

Sharon D. Mayo

CERTIFICATE OF SERVICE

I am over eighteen years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 777 South Figueroa Street, Forty-Fourth Floor, Los Angeles, California 90017-5844.

I hereby certify that on **April 29, 2021** I electronically filed the documents entitled:

- **STIPULATION TO RELEASE AND PAY FUNDS DEPOSITED WITH THE COURT; AND**
- **[PROPOSED] ORDER TO RELEASE AND PAY FUNDS DEPOSITED WITH THE COURT**

with the Clerk of the Court using the CM/ECF system and said document was served in the manner stated below:

☒ **By Court Via Notice of Electronic Filing (NEF)**: The document(s) was served by the court via NEF and hyperlink to the document. On **April 29, 2021**, I checked the CM/ECF docket for this case or adversary proceeding and determined that the person(s) listed below is/are on the Electronic Mail Notice List to receive NEF transmission at the email addresses indicated below:

Darius G. Adli	adli@adlilaw.com
Drew Harris Sherman	drew.sherman@adlilaw.com
Fred D. Heather	fheather@glaserweil.com
Rory S. Miller	rmiller@glaserweil.com

☒ **Federal**: I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Dated: April 29, 2021

Signature: Rebecca McNew
Rebecca McNew